IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

)	CASE NO.
J. ENDRES)	5:17cv2408
)	
)	JUDGE SARA LIOI
v.)	
)	
NORTHEAST OHIO MEDICAL)	PLAINTIFF'S
UNIVERSITY, et al.)	PRELIMINARY ESTIMATE OF
)	THE AMOUNT OF ANTICIPATED
)	ATTORNEYS FEES AND EXPENSES
)	
)	
)	

Pursuant to this Court's Case Management Conference Scheduling Order (Doc. 11),

Plaintiff's provides the following estimate of anticipated attorney's fees and expenses in
the prosecution of Plaintiff's claim against Defendants:

Attorney Fees

Preliminary Investigations & Initial Pleadings		\$35,000.00
Procedural Motions Practice		\$15,000.00
Discovery		\$25,000.00
Dispositive Motions Practice		\$25,000.00
Settlement Negotiations		\$10,000.00
Trial (including preparation)		\$100,000.00
	TOTAL FEES	\$210,000.00

Costs

Depositions \$100,000.00

Experts \$20,000.00

Witness Fees \$ minimal

Other \$1,000.00

TOTAL COSTS \$121,000.00

TOTAL FEES AND COSTS \$331,000.00

NESENOFF & MILTENBERG, LLP

/s/ Andrew Miltenberg

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-and-

BERKMAN, GORDON, MURRAY & DEVAN

/s/ J. Michael Murray

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Attorneys for Plaintiff